# IN THE UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF TEXAS LAREDO DIVISION

In re:	) Chapter 11
4E BRANDS NORTHAMERICA LLC, <sup>1</sup>	) Case No. 22-50009
Debtor.	)
	_ )

# DEBTOR'S WITNESS AND EXHIBIT LIST FOR HEARING SCHEDULED FOR FEBRUARY 23, 2022 AT 12:00 P.M. (PREVAILING CENTRAL TIME)

The above-captioned debtor and debtor in possession (the "<u>Debtor</u>"), files its Witness and Exhibit List for the hearing to be held on February 23, 2022 at 12:00 p.m. (prevailing Central Time) (the "<u>First Day Hearing</u>") as follows:

#### **WITNESSES**

The Debtor may call the following witnesses at the Hearing:

- 1. David Dunn:
- 2. Sheryl Betance;
- 3. Any witness listed or called by any other party;
- 4. Rebuttal witnesses as necessary; and
- 5. The Debtor reserves the right to cross-examine any witness called by any other party.

<sup>&</sup>lt;sup>1</sup> The Debtor in this Chapter 11 case, along with the last four digits of the Debtor's federal tax identification number, is 4E Brands Northamerica LLC (0310). The Debtor's principal place of business is 17806 Interstate Highway 10, Suite 300, San Antonio, TX 78257. The Debtor's service address is: 700 Canal Street, Suite 12E, Stamford, CT, 06902.

### **EXHIBITS**

EXHIBIT	DESCRIPTION	MARK	OFFER	OBJECT	ADMIT	W/D	DISPOSITION AFTER TRIAL
1.	Declaration of David M. Dunn, Chief Restructuring Office, in Support of						
	the Chapter 11 Petitions and the First Day Motions [Docket No. 5]						
2.	DIP Term Sheet [Docket No. 6-1]						
3.	Interim Budget [Docket No. 6-1]						
4.	Declaration of Sheryl Betance in Support of Debtor's Emergency Application for Entry of an Order Authorizing the Retention and Appointment of Stretto as Claims, Noticing and Solicitation Agent [Docket No. 3]						
5.	Notice of Commencement [Docket No. 2-1]						
	Any document or pleading filed in the above-captioned main cases						
	Any exhibit necessary for impeachment and/or rebuttal purposes						
	Any exhibit identified or offered by any other party						

# **RESERVATION OF RIGHTS**

The Debtor reserves the right to call or to introduce one or more, or none, of the witnesses and exhibits listed above, and further reserve the right to supplement this list prior to the First Day Hearing.

February 23, 2022

#### /s/ Genevieve M. Graham

#### JACKSON WALKER LLP

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Proposed Counsel to the Debtor and Debtor in Possession

## **Certificate of Service**

I certify that on February 23, 2022, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Genevieve M. Graham

Genevieve M. Graham